

#### Fw: Bolton HASP Revised 04/28/2011 Kimberly Tisa to: Katherine Woodward

04/28/2011 03:58 PM

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---- Forwarded by Kimberly Tisa/R1/USEPA/US on 04/28/2011 03:58 PM -----

From:

"Ashis Roychowdhury" <aroychowdhury@eagleenviro.com>

To:

Kimberly Tisa/R1/USEPA/US@EPA

Date:

04/28/2011 03:03 PM

Subject:

FW: Bolton HASP Revised 04/28/2011

Kim,

Attached is the contractor's revised HASP. They have amended the paragraph to reflect the change. Thanks.

#### **Ashis**

From: Jeff Ploszay [mailto:Jeff@aaiscorp.com]

Sent: Thursday, April 28, 2011 3:00 PM

To: Ashis Roychowdhury

Subject: Bolton HASP Revised 04/28/2011

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SOW Bolton School PCB Exterior Wall REV 1.docx

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AAIS Site Specific Health and Safety Plan 4/15/2011

PCB Remediation - Window Removal, Interior and Exterior Wall Demolition as PCB

General Information Scope and Application Worker Protection

#### Site Location:

Bolton High School 72 Brandy Street Bolton, CT

AAIS is committed to providing a hazard free workplace, paying strict attention to conditions which may cause personal injury or property damage. To this end the following applies:

Due to the nature of the scope of work for this project, workers will perform assigned tasks in accordance with the AAIS Corp Safety and Health Program and /or the specific sections found in this Addendum.

#### General Site Information:

The site is a public high school. The affected portion of the building covered by the work is identified as interior and exterior caulk at the joint between the window frame, and the interior CMU wall and Exterior brick veneer wall meet.

# Scope and Application:

The general scope of work for this project will consist of demolition of the entire section of the interior block, and exterior brick wall. The removal of (CMU, Brick Veneer, Tectum Soffit, Window System and Caulking) as PCB containing materials

A negative pressure containment will be constructed along both sides of the exterior wall. The containment will consist of 2 6 mill layer poly walls on both the interior and the exterior of the building. The exterior poly will be supported by 2x4 wood framing for strength and weather resistance. The dumpsters will be incorporated into the containment for direct loading of the PCB material.



## SELECTIVE DEMOLITION . ASBESTOS . LEAD . MOLD

The interior and exterior window and door caulks, as well as the associated metal window systems, all metal window frames, and all door frames will be disposed of as PCB Bulk Product Waste without attempting to clean the metal components. All dumpsters will first be lined with (2) 10 Mill leak proof poly liners and (1) internal Puncture Resistant Poly-Pro Liner.

All interior CMU walls, and the exterior brick veneer with the associated layer of concrete, soffit caulk will be loaded in the same manner into separate dumpsters and sent out as PCB bulk remediation waste. (PCB containing < 50ppm)

Please note that entire work will be performed using a containment procedure for both the interior and exterior work. AAIS Corp. will divide work areas into sections typically to have better control on containment procedure and isolation of the work areas. Interior and exterior of each work area will be contained together to maintain negative pressure even after window walls are removed. The interior work area will be isolated from the rest of the student occupied building by solid barriers in the existing school. The exterior will be secured by chain link fence, lined with orange construction fence for the entire time the PCB abatement is being performed. This is s shown on the drawing marked Work Area Diagram PCB-1, attached with Eagle application.

The use of minimal quantities of water spray to moisten the generated dust prior to collection shall be utilized. Under no circumstances shall the PCB Remediation Waste show evidence of free liquid water or pooling within the waste stream. Any liquid used to wet the dust and debris to control fugitive emissions shall be collected and disposed of as PCB liquid waste in accordance with 40CFR Part(61,61(a)(5)(iv). All rags and other cleaning materials used to clean shall also be properly disposed of as PCB Remediation Waste. All PCB Remediation Waste shall be stored for disposal in accordance with 40 CFR Part 761.65. All waste containers shall be appropriately labeled in accordance with 40 CFR Part 761.40 and 761.45.

The next phase will consist of removing the remaining CMU, Brick Veneer and Tectum soffit. This task will be achieved by separating the block so it can be removed by hand transported in wheel barrows and put into a lined hazardous waste container. This material will be disposed of as PCB bulk remediation waste (PCB containing < 50 ppm).

The scope of work as described in Area 1 and Area 2 includes the removal of exterior windows and soffit covering as well as the removal of all interior CMU walls and exterior brick walls. This was outlined in Eagle Plan Section 3.2.2- PCB Bulk Remediation Material, items 2 and 3 and again in Eagle Plan Sections 3.3.1 & 3.3.2. These sections stated that all interior CMU block and all exterior brick within the. 1963 wing at the window wall will be removed.

AAIS Corp. will follow marking requirements as identified in 761.40 and 761.45



# **Employee Qualifications and Training**

Work will be performed as described in the scope of work by qualified, trained and licensed personnel in accordance with all OSHA, EPA, CTDPH and CTDEP requirements. Workers performing PCB abatement have successfully completed 40 Hour Hazwoper training in accordance with 29CFR 1910.120.

AAIS workers are trained a minimum of 10 hour OSHA, and 40 hour HAZWOPER in accordance to OSHA regulations, 29CFR1910, 1926. Site specific training will be conducted on site prior to the start of the project. Licenses, training certifications and qualifications will be submitted prior to start of the project. Work will be performed in accordance with all OSHA, EPA, CTDPH and CTDEP requirements.

## Safety Control and Security

AAIS accepts the responsibility to establish and maintain a workplace that is both safe and secure.

To this end, AAIS will maintain a Competent Person (as defined in OSHA 29 CFR Part 1926) on site at all times.

# Worker Protection and Contamination Control

Once abatement has begun in the containment, all persons entering the abatement area shall wear as a minimum, a hooded full body protective suit gathered at the wrists and the ankles, protective shoe coverings, and an approved respirator. This level of prescribed protective clothing must be maintained until the final inspection and monitoring deem the containment area to be free of risks. Respirator cartridges for demolition and abatement of PCB containing materials on this project will consist of combination HEPA and organic vapor cartridges. This and other personal protective equipment will be provided free of charge to the employees of AAIS.

AAIS Corp. will follow the marking requirements as identified.

WARNING
HAZARDOUS WASTE WORK AREA
PCBs-POISON
NO SMOKING, EATING OR DRINKING
AUTHORIZED PERSONNEL ONLY



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#### PROTECTIVE CLOTHING REQUIRED IN THIS AREA

Before leaving the work area each person shall: vacuum or wet wipe any gross contamination from protective clothing, proceed to the Decontamination (Decon) Unit and remove all clothing except respirator. While still wearing the respirator, the worker shall proceed naked to the shower and clean the respirator and self using soap and water and rinse self in the shower. All PPE and waste water shall be disposed of in a receptacle for hazardous waste.

Following showering and drying off, each person shall proceed directly to the Clean (change) Room and dress in street clothes at the end of each days work or before eating or taking a break.

Smoking, drinking, eating, or chew gum or tobacco in the abatement area is strictly prohibited.

#### Tools / Equipment Decontamination

Tools and small equipment used to perform this project will be swabbed with a non-chlorinated solvent cleaner such as but not limited to: kerosene, diesel fuel, hexane, naptha, terpene, etc. (761.79 approved PODFs) (761.79 decontaminating movable equipment). After cleaning, tools and equipment will be sprayed and wiped with ALCONOX cleaner. Cleaning materials such as rags, etc. will be disposed of in the same containers as the PCB contaminated waste. Waste materials to be disposed will be solids.

## **Hazardous Material Storage and Disposal**

PCB bulk product waste (PCB containing > 50 ppm) will be stored in sealed, poly lined, covered 30 yard waste containers. The containers will be protected from conditions that could cause damage resulting in loss of the containers integrity. PCB bulk remediation waste (PCB containing < 50 ppm) will be stored in a covered poly lined 30 yard waste container. Both containers will be inspected daily for containment integrity. Both drums and containers will be labeled in accordance with 40 CFR 761.40.

The PCB waste material containers will be scheduled to be removed from the site within the thirty day time frame per 40 CFR 761.65. If additional time is required an extension may be applied for in accordance with 40 CFR 761.65.

Waste Hauler EPA Identification number, Red Technologies CT-HW-812



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PCB containing materials characterized as PCB bulk remediation waste (< 50 ppm) will be disposed of at the Turnkey Landfill in New Hampshire.

PCB containing materials characterized as PCB bulk product waste (>50 ppm) will be disposed of at Wayne Disposal Inc. Site#2 Landfill, 49350 N. I-94 Service Drive, Belleville, MI 48111.

Storage, transportation and disposal will be in accordance with 40 CFR 761.61, 40 CFR 761.62 and 40 CFR 761.65. Signage and labeling will be in accordance with 40 CFR 761.40